

**ILI**

# **Inspection Standards**

# **Qualification of Pipeline Personnel**

# History

- Pipeline regulations have always required training/qualifying personnel
- Need for broader approach identified
  - 1987 NTSB recommendation on annual training
  - 1992 legislation on qualification with certification
  - 1994 proposed rule on training
  - 1996 legislation dropping certification
  - 1997 NTSB recommendation on training and testing
- 1999 Final Rule based on negotiated rulemaking

# Need for Additional Work

- Development of protocols
- Continued NTSB concern
- Congressional concern resulting in 2002 legislation
  - Requires training as appropriate
  - Adds other required elements
- Public meeting identified 13 gaps
- Formation of B31Q Committee

# Where we are now?

- Qualification programs in place under 1999 Rule
- Direct Final Rule requires training as appropriate
- NTSB not satisfied that safety objectives are met
- B31Q likely not completed, before next round of Congressional oversight

# 13 Perceived Gaps and B31Q Capture

- Scope of OQ Inspections – Chapter 1
- Lack of Identified Knowledge, Skills and Abilities – Chapter 8
- Re-evaluation Intervals – Chapter 9
- Maintenance vs. New Construction – Chapters 1, 5

## 13 Perceived Gaps and B31Q Capture

- Treatment of Emergency Response – Chapter 9
- Missing Covered Tasks (excavation) – Chapter 5
- Extent of Documentation – Chapter 13
- Generic vs. Task-specific Abnormal Operating Conditions – Chapter 6
- Treatment of Training – Chapter 7

## 13 Perceived Gaps and B31Q Capture

- Criteria for Small Operators – Chapter 1
- Use of Directing and Observing - Chapter 9
- Noteworthy Practices - Not addressed by the standard
- Persons Contributing to an Accident - Chapter 9



# **Need Help on a Couple Questions**

- When is training appropriate for qualification?

# **Need Help on a Couple Questions**

- How does an operator provide sufficient objectivity in evaluation of knowledge, skills, and abilities?

# **Need Help on a Couple Questions**

- Assuming some flexibility in re-qualification intervals, should there be a difference based on infrequent and critical work – such as abnormal operating conditions?

# **Not Covered in B31Q**

Tasks that impact integrity of pipeline but are performed off the line – such as interpreting pig logs



# Basics of a Standard on Qualifications

- Who is covered?

# **Basics of a Standard on Qualifications**

- What safety work is covered?

# **Basics of a Standard on Qualifications**

- What knowledge, skills, and abilities are needed?

# Basics of a Standard on Qualifications

- How does the operator verify objectively that individuals have them?



# **Basics of a Standard on Qualifications**

- How is qualification kept current?

# Basics of a Standard on Qualifications

- What documentation is needed?

